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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

SEP 23 1993

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

TO:

SUBJECT: Vinclozolin. Over-tolerance Residues in/on Onions. MRID

No. 42593701. CBRS No. 11283. DPBarcode D187397.

FROM: Felecia A. Fort, Chemist

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Health Effects Division (H7509C)

THRU: William J. Hazel, Ph.D., Section Head

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Over-tolerance residues of vinclozolin in or on onions grown in California were reported by BASF Corporation to the Agency in 1990 (not reviewed by CBRS). Subsequently the registrant has submitted the studies (MRID No. 42593701) in which over-tolerance residues were found for CBRS review. Currently the tolerance in or on bulb onions is set at 1.0 ppm [40 CFR 180.380].

Four trials were conducted to determine the magnitude of the residue of vinclozolin in or on dry bulb onions in California. Five applications of Ronilan WP at 14-day intervals were made to onions at the maximum rate of 1.0 lb ai/A using ground equipment. The treatment-to-harvest interval (which is also the label PHI) was 18 days. Samples were stored frozen for up to 8 months prior to analysis. A GC-ECD method (designated Method 137-012-2) was used to analyze the samples. Residues ranged from 0.12 to 14.93 ppm. Residues above the tolerance were 5.18-14.93 ppm in six samples from two trials in the Salinas Valley.

The registrant states that samples in which over-tolerance residues were found consisted of both onion tops and onion bulbs instead of onion bulbs only. The onions were planted out of season which was suspected as being the most likely contributor to the overtolerance residues. The registrant has this opinion because, upon reanalysis of dry bulbs separately from one Salinas Valley field trial in which vinclozolin residues were detected at 9.00 - 14.93 ppm in bulbs plus tops, residues were found at 3.33-5.84 ppm, i.e. reduced but still tolerance-exceeding. Onions are typically planted in February or March in Salinas Valley, California but in the trials resulting in tolerance exceedance, onions were planted The registrant also states that no residues were above 1.0 ppm in 21 trials previously conducted (MRID No. 40297403). We note that residues were 0.12-0.29 ppm in six bulb onion samples from the two CA trials in which planting occurred in January or April.

Conclusions

The registrant must submit a petition to increase the tolerance for vinclozolin in or on bulb onion from 1.0 ppm to 6.0 ppm.

cc: Reviewer(F. Fort), List B File, RF, SF, J. Kariya(DRES, HED),
Circ.

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